

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

BARBARA LODER HILDEBRANDT,	:	
	:	
Plaintiff	:	CASE NO. C-1-02-0003
vs.	:	
HYATT CORPORATION, <i>et al.</i> ,	:	Judge Beckwith Magistrate Judge Sherman
Defendants	:	
	:	

**PLAINTIFF'S REQUEST FOR AN EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

On March 1, 2004, Defendants filed a fifty-one page summary judgment motion with numerous exhibits. Plaintiff respectfully requests an extension of time to respond to the motion because depositions of Hyatt officials, which Plaintiff's counsel has been seeking since November 2004, have not yet taken place. These depositions are necessary for response to the motion.

In response to Plaintiff's discovery request for depositions of three Hyatt officials, filed more than 30 days before the January 7, 2004 discovery deadline, the parties agreed to take these depositions early in 2004, but after the discovery deadline in order to accommodate the Hyatt officials' schedules. Plaintiff appeared for her second deposition on December 18, 2003. Various factors have caused the parties to reschedule the depositions in January, February, and March 2004. The parties have agreed to complete these depositions as soon as possible, and Plaintiff is awaiting dates from Defendant for April 2004. The parties are seeking to schedule the three depositions on two consecutive days in

Chicago, Illinois in order to avoid duplicating travel expenses. The parties have agreed that Plaintiff may have an extension of time of 20 days from the date the depositions are completed to respond to Defendant's summary judgment motion.

Therefore, Plaintiff respectfully requests an extension of time until twenty days following the depositions to file her response to Defendant's Summary Judgment motion. The Final Pretrial Conference is scheduled for July 23, 2004 and trial is scheduled for August 9, 2004.

Respectfully submitted,



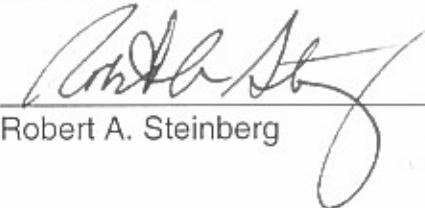
Stanley M. Chesley (0000852)
Robert A. Steinberg (0032932) Trial Attorney
WAITE, SCHNEIDER, BAYLESS
& CHESLEY CO., L.P.A.
1513 Fourth and Vine Tower
Cincinnati, OH 45202
513-621-0267
bobsteinberg@wsbclaw.cc

and

Michael J. O'Hara (0014966)
O'HARA, RUBERG, TAYLOR, SLOAN
& SERGENT
209 Thomas More Park, Suite C
P.O. Box 17411
Covington, Kentucky 41017-0411
(606) 331-2000
mohara@ortlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion was served by electronic filing via the CM/ECF System to Theresa M. Gallion, Esq. and Natalie J. Storch, Esq. this 22d day of March 2004.



Robert A. Steinberg